

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF CORRESPONDENCE REGARDING THE ONE HUNDRED SECOND  
OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF  
PUERTO RICO, PUERTO RICO HIGHWAYS AND TRANSPORTATION  
AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT  
OF THE COMMONWEALTH OF PUERTO RICO TO INDIVIDUAL PROOF OF  
CLAIM NO. 24111.**

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To the Honorable United States District Judge Laura Taylor Swain:

1. On December 12, 2019, the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight”

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Board”), as the sole representative of the Commonwealth, HTA and ERS (collectively, the “Debtors”) pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> filed the *One Hundred Second Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment or Services Provided* [ECF No. 9552] (the “One Hundred Second Omnibus Objection”) to various proofs of claim.

2. The One Hundred Second Omnibus Objection seeks to disallow certain deficient claims which purport to assert liabilities arising from salary or other compensation owed in connection with employment, pensions, or services provided by the claimant, but fail to provide critical information, such as the specific services provided, the salary accrued but unpaid, or other information needed to understand what liabilities any of the Commonwealth, HTA, ERS, or any other Title III Debtor may owe.

3. The Debtors have received the attached correspondence from Roberto Navarro Lugo (“Navarro Lugo”), a copy of which is attached hereto as Exhibit “A”, (the “Navarro Lugo Response”), regarding Proof of Claim No. 24111 (the “Navarro Lugo Claim”). A certified translation of the Navarro Lugo Response is attached hereto as Exhibit “A-1”.

4. The Navarro Lugo Response consists of a copy of a document entitled *Reglamento Para la Administración de los Recursos Humanos en el Servicio del Departamento de Recursos Naturales y Ambientales*, as well as two printed pages from a website. The Navarro Lugo Response does not, however, contain any information necessary to evaluate the Navarro Lugo Claim, such as an explanation of the basis for any liabilities owed to Navarro Lugo. Accordingly,

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

the Debtors have determined that the Navarro Lugo Response still does not provide sufficient information to enable the Debtors to reconcile the Navarro Lugo Claim.

5. Accordingly, the Debtors respectfully request that the Court grant the One Hundred Second Omnibus Objection and disallow the Claim, notwithstanding the Navarro Lugo Response.

Dated: November 11, 2020  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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